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Co-Lead Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

WHB 1486 V. Uber Technologies, Inc., et al.,
Case No. 24-cv-4803;

A.R.2 v. Uber Technologies, Inc., et al.,
Case No. 3:24-cv-07821;

Dean v. Uber Technologies, Inc., et al.,
Case No. 23-cv-6708;

B.L. v. Uber Technologies, Inc., et al.,
Case No. 2f-cv-7940;

LCHB128 v. Uber Technologies, Inc., et al.,
Case No. 24-cv-7019; and

WHB 1876 v. Uber Technologies, Inc., et al.
Case No. 24-cv-5230.

Case No. 3:23-md-03084-CRB (LJC)

STIPULATION AND ~~[PROPOSED]~~ ORDER
TO RESET DEADLINES RE: PTO NO. 26
AND EXPERT DEMONSTRATIVES

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6-17th Floor

STIPULATION TO RESET DEADLINES AND
EXPERT DEMONSTRATIVES

1 WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1
2 Case Assignments and Discovery Schedule;

3 WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by
4 August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and
5 Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert
6 reports by September 22, 2025 [ECF 3533];

7 WHEREAS, the parties agree certain fact discovery remains open for completion -- including
8 a 30(b)(6) deposition on August 21, 2025 that is necessary for expert discovery;

9 WHEREAS, the parties agree that expert deadlines should be modified such that the
10 exchange of expert reports should move from August 22, 2025 to August 29, 2025, and the
11 exchange of rebuttal expert reports should move from September 15, 2025 to September 29, 2025;

12 WHEREAS, the parties agree that extending the aforementioned deadlines will not require
13 extending any other deadlines set by Pretrial Order No. 26.

14 WHEREAS, the Court's Standing Order on Civil Jury Trials Section II(F)(1) regarding Expert
15 Witnesses provides, in relevant part: "expert reports must be complete and sufficiently detailed.
16 Illustrative animations, diagrams, charts and models may be used on direct examination only if they
17 were part to the expert's report... By written stipulation, of course, all sides may relax these
18 requirements."

19 WHEREAS, on June 3, 2025, the Parties indicated their intent to provide a stipulation
20 relaxing these requirements to the Court. ECF 3157.

21 THEREFORE, the parties respectfully request the Court enter the parties' stipulation and
22 that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533 be extended as
23 follows:

- 24 • The parties shall exchange expert reports by August 29, 2025.
 - 25 • The parties shall exchange expert rebuttal reports by September 29, 2025.
- 26
27
28

1 IT IS HEREBY STIPULATED AND AGREED by the Parties that expert reports need not
2 include “[i]llustrative animations, diagrams, charts and models” for them to be used on direct
3 examination.

4
5 **IT IS SO STIPUALTED.**

6
7 DATED: August 14, 2025

Respectfully submitted,

8 By: /s/ Sarah London

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1 Dated: August 14, 2025

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14 UBER TECHNOLOGIES, INC.,

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: August 14, 2025

/s/ Sarah R. London

SARAH R. LONDON

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated: August 15, 2025

